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2001 MAY 14 P. 6: 18

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

AUDIT REFERRAL: 99-21

DATE ACTIVATED: August 7, 2000

EXPIRATION OF STATUTE OF

LIMITATIONS: February 18, 2003¹

STAFF MEMBER: Susan L. Kay

SOURCE: AUDIT REFERRAL

RESPONDENTS: Friends of Ronnie Shows and
Cecil Brown, as treasurer²
International Brotherhood of Electrical Workers'
Committee on Political Education and
Edwin D. Hill, as treasurer
Maintenance of Way Political League and
William E. LaRue, as treasurer
Nancy Pelosi for Congress and
Paul F. Pelosi, as treasurer
William C. Deviney, Jr.
William H. Liston
Carl L. Nicholson, Jr.
Earline C. Sawyer
Ray A. Sims
Phyllis Smith
David Stephens
Lawrence W. Warren

RELEVANT STATUTES: 2 U.S.C. § 434(a)
2 U.S.C. § 434(b)
2 U.S.C. § 438(b)
2 U.S.C. § 441a
2 U.S.C. § 441a(f)

¹ The earliest apparent violations in Audit Referral 99-21 are related to the Committee's receipt of excessive currency contributions. The earliest date on which the limitations period would run with respect to an apparent violation in this matter is February 18, 2003. See 28 U.S.C. § 2462.

² On August 14, 2000, Friends of Ronnie Shows notified the Reports Analysis Division that Cecil Brown replaced Thomas G. Bass as treasurer of the Committee.

23.04.406.3988

2 U.S.C. § 441b(a)
2 U.S.C. § 441f
2 U.S.C. § 441g
11 C.F.R. § 103.3(b)(3)
11 C.F.R. § 110.1(b)(5)
11 C.F.R. § 110.1(k)(3)
11 C.F.R. § 110.4(b)
11 C.F.R. § 110.4(c)

INTERNAL REPORTS CHECKED: Audit Documents
 Disclosure Reports

FEDERAL AGENCIES CHECKED: None

MUR: 5017
DATE COMPLAINT FILED: May 19, 2000
DATE OF NOTIFICATION: May 26, 2000
DATE ACTIVATED: September 21, 2000

EXPIRATION OF STATUTE OF
LIMITATIONS: March 20, 2003³
STAFF MEMBER: Susan L. Kay

SOURCE: COMPLAINT GENERATED

COMPLAINANT: National Republican Congressional Committee

RESPONDENTS: Friends of Ronnie Shows and
 Cecil Brown, as treasurer
 The Honorable Clifford Ronald "Ronnie" Shows
 International Brotherhood of Electrical Workers'
 Committee on Political Education and
 Edwin D. Hill, as treasurer
 Maintenance of Way Political League and
 William E. LaRue, as treasurer
 David Berndt
 R. L. Kemp⁴
 Carl L. Nicholson, Jr.

³ The earliest apparent violations in MUR 5017 are related to the Committee's receipt of excessive contributions from individuals. The earliest date on which the limitations period would run with respect to an apparent violation in this matter is March 20, 2003. See 28 U.S.C. § 2462.

⁴ According to her response to the complaint, R. L. Kemp is also known as Jerry W. Kemp.

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Adcock/Apple Apartments
Employer Plus
L&K Investments
Southern Development
Carpenter Construction Co.
D&M Construction
Dorsey & Thom's Chiropractic Clinic, P.A.
Dulin & Dulin, Ltd.
Duncan Lee Lott, P.A.
Dungan Engineering, P.A.
Employer Plus, Inc.
Funches & Associates
Gerald J. Diaz, Jr., P.A.
Great Southern Tractor
Greenville Chiro. Clinic
Ingram & Assoc.
Kirk & Co.
Langston/Frazer Properties
Natchez Steam Laundry
Southwest Publishers
Tollison Law Firm, P.A.

RELEVANT STATUTES:

2 U.S.C. § 434(b)(3)(A)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(2)(A)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b(a)
2 U.S.C. § 441f
2 U.S.C. § 441g
11 C.F.R. § 103.3(b)(3)
11 C.F.R. § 104.7(b)
11 C.F.R. § 110.1(b)(5)
11 C.F.R. § 110.1(k)(3)
11 C.F.R. § 110.4(b)

INTERNAL REPORTS CHECKED:

Audit Documents
Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

23-04-406-3990

I. GENERATION OF MATTER

Audit Referral 99-21 was generated by an audit of Friends of Ronnie Shows ("the Committee") undertaken in accordance with 2 U.S.C. § 438(b). The referral materials are attached. Attachment 1. MUR 5017 was generated by a complaint filed by the National Republican Congressional Committee. Attachment 2. According to the Audit Division, the Committee accepted excessive contributions from individuals, excessive contributions from political committees, and excessive currency contributions. The complainant in MUR 5017 alleges that the Committee accepted excessive contributions from individuals, excessive contributions from political committees, prohibited corporate contributions, and failed to report required contributor information when itemizing contributions from individuals.

II. COMPLAINT AND RESPONSES

A. Complaint

The complaint is based on a newspaper article, which in turn is based on the Committee's financial disclosure reports filed with the Commission. The complaint alleges the Committee accepted excessive contributions from individuals totaling \$43,125, and gives the following examples: R. L. Kemp (\$1,000 excessive for the general election); Carl Nicholson (\$13,000 excessive for the primary election);⁵ and David Berndt (\$1,000 excessive contribution for the primary election). Attachment 2. See 2 U.S.C. §§ 441a(a)(1)(A) and 441a(f).

The complainant also alleges that the Committee accepted excessive contributions from political committees and gives the following examples: International Brotherhood of Electrical

⁵ The complainant alleges that Mr. Nicholson's contribution was excessive and that "although Shows states that this was a check representing contribution from many different individuals," the Committee failed to itemize the contributions. Attachment 2 at 3; See 11 C.F.R. § 104.3(a)(4). See Section IV. A. 1., *infra*.

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Workers' Committee on Political Education ("IBEW-COPE") (\$2,000 excessive for the general election) and Maintenance of Way Political League (\$500 excessive for the general election). *Id.* at 3; *See* 2 U.S.C. §§441a(a)(2)(A) and 441a(f).

In addition, the complainant alleges that the Committee accepted prohibited corporate contributions and cites the following examples: Adcock/Apple Apartments (\$500), Employer Plus (\$1,000), L&K Investments (\$1,000), and Southern Development (\$1,000). Attachment 2 at 2; *See* 2 U.S.C. § 441b(a).

Finally, the complainant alleges that the Committee failed to use "best efforts" in obtaining and reporting required contributor information, and argues that the Committee's failure to use "best efforts" during the campaign is "demonstrative of [Shows'] efforts to conceal the true source of his funding." Attachment 2 at 4; *See* 2 U.S.C. § 434(b)(3)(A).

B. Responses

1. Committee's Response

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2. **Individual Contributors' Responses**

Jerry W. Kemp responded to the complaint on June 13, 2000. Attachment 4. In her response, she asserts that she made a \$1,000 contribution on September 15, 1998 and a \$1,000 contribution on October 21, 1998, intending "one contribution to be for herself and one contribution to be for her husband." *Id.* The Committee refunded \$1,000 of her contribution. *Id.*

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3. Political Committees' Responses

Counsel for IBEW-COPE responded to the complaint on June 5, 2000. Attachment 6.

The response acknowledges that an excessive contribution was made, but claims it was inadvertent and that this violation was corrected. *Id.* at 2. IBEW-COPE records show that on August 8, 1998, IBEW-COPE contributed \$5,000 to the Committee for the general election. *Id.* On August 31, 1998, IBEW-COPE contributed an additional \$2,000 to the Committee for the general election, resulting in an excessive \$2,000 contribution. *Id.*; See 2 U.S.C. § 441a(a)(2)(A). The response states that IBEW-COPE received a \$2,000 refund on June 19, 1999 and requests that the Commission take no action against them in this matter. *Id.* at 2.

The Maintenance of Way Political League ("MWPL") responded on June 19, 2000 with a signed, sworn to, and notarized letter, asserting that the MWPL did not contribute in excess of the limitation. Attachment 7 at 1. The response itemizes the following contributions from MWPL to the Committee:

<u>Date</u>	<u>Amount</u>	<u>MWPL Purported Election Designation</u>
5/21/98	\$2,500	Primary
6/19/98	\$2,500	Primary

9/16/98	\$1,000	General
10/23/98	\$1,000	General
10/29/98	\$1,000	General
12/15/98	\$2,000	General-Debt Retirement

4/13/99	\$1,000	2000 Primary
6/21/99	\$1,000	2000 Primary
8/2/99	\$500	2000 Primary
11/5/99	\$1,000	2000 Primary

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Id. at 1-2. The response explains that the appearance of an excessive contribution results from the Committee improperly treating MWPL's December 15, 1998 contribution as designated for the 2000 primary election, when in fact it was designated for the 1998 general election/debt retirement.⁸ *Id.* at 1. MWPL claims that when the Committee erroneously aggregated the December 15, 1998 contribution of \$2,000 with a total of \$3,500 in other contributions designated for the Year 2000 primary, the MWPL apparently exceeded the primary limit by \$500. *Id.* MWPL nonetheless redesignated \$500 of the November 5, 1999 Year 2000 primary contribution to the 2000 general election. *Id.* at 2. The response requests that the Commission take no further action against the MWPL. *Id.*

4. Corporate Contributors' Responses

Adcock/Apple Apartments responded to the complaint on June 6, 2000, asserting that Adcock/Apple Apartments is a "private ownership business owned solely by [Jesse Adcock]." Attachment 8 at 1. The response states that Adcock/Apple Apartments' contribution by check dated May 1, 1998 was for \$100, not \$500 as stated in the complaint, and has been refunded. *Id.*

On June 13, 2000, Lequita Kittrell and Kerry Kittrell responded to the complaint's allegation that L&K Investments made a \$1,000 prohibited contribution. Attachment 9. They state that L&K Investments is not and has never been a corporation, and is merely "a husband and wife doing business." *Id.* at 1.

Danny Moseley and David Keyes responded to the complaint on behalf of Southern Development on June 6, 2000. Attachment 10. Messrs. Moseley and Keyes stated that the

⁸ Attached to the response is a letter from the Committee to the Maintenance of Way Political League ("League") dated January 27, 2000 asserting that the League contributed \$500 in excess of the limitation for the 2000 primary election and that the League should therefore redesignate \$500 to the 2000 general election.

\$1,000 contribution at issue was made from a checking account in the name of Southern Development, which they assert is neither a corporation nor a legal entity, but "simply a checking account through which [] rental income and expenses are handled." *Id.* at 1. The response states that they have received a \$1,000 refund. *Id.*⁹

III. LAW

The Act limits contributions from individuals to \$1,000 per election. 2 U.S.C.

§ 441a(a)(1)(A). Contributions which on their face, or when aggregated with other contributions from the same contributor, exceed the Act's contribution limitations shall be refunded within 60 days, redesignated, or reattributed. 11 C.F.R. §§ 103.3(b)(3); 110.1(b)(2); 110.1(k)(3). The Act limits contributions from multicandidate political committees to the principal campaign committees of federal candidates with respect to any election to \$5,000. 2 U.S.C.

§ 441a(a)(2)(A). Political committees are prohibited from accepting contributions in excess of these limitations. 2 U.S.C. § 441a(f).

Corporations are prohibited from contributing to political committees. 2 U.S.C.

§ 441b(a). Political committees are prohibited from accepting corporate contributions. *Id.*

Contributions that present genuine questions as to whether they were made by corporations may be, within ten days of receipt, either deposited or returned to the contributor. 11 C.F.R.

§ 103.3(b)(1). If deposited, the treasurer shall make best efforts to determine the legality of the contribution. *Id.* If the contribution cannot be determined to be legal, the treasurer shall refund the contribution within 30 days. *Id.*

The Act and Commission regulations prohibit contributions in the name of another.

2 U.S.C. § 441f; 11 C.F.R. § 110.4(b). No person shall make a contribution in the name of

⁹ Employer Plus did not respond to the complaint.

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another person or knowingly permit his name to be used to effect such contribution. *Id.* No person shall knowingly accept a contribution made by one person in the name of another. *Id.*

The Act prohibits contributions of United States currency to or for the benefit of any candidate with respect to any such candidate for nomination for election, or for election, to federal office, which, in the aggregate, exceed \$100. 2 U.S.C. § 441g. The amount of an anonymous cash contribution in excess of \$50 shall be promptly disposed of, and may be used for any lawful purpose unrelated to any federal election, campaign, or candidate. 11 C.F.R. § 110.4(c).

The Act requires principal campaign committees to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a). Reports required to be filed under section 434 of the Act shall identify each person who makes a contribution during the reporting period, whose contributions have an aggregate amount in excess of \$200 within the calendar year, together with the date and amount of any such contribution. 2 U.S.C. § 434(b)(3)(A). "Identification" means, in the case of any individual, the name, mailing address, and the occupation of such individual, as well as the name of his or her employer. 2 U.S.C. § 431(13). Under the Act, when the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit information required under the Act, the Committee's reports or records shall be considered in compliance with the Act. 2 U.S.C. § 432(i).

A political committee and its treasurer will only be deemed to have exercised best efforts if the requirements of 11 C.F.R. § 104.7(b)(1)-(4) are satisfied. 11 C.F.R. § 104.7(b). All written solicitations shall include a clear request for the required contributor information; the treasurer shall make at least one effort after the receipt of the contribution to obtain missing information no later than 30 days after receipt of the contribution; the committee shall either file

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with its next report an amended memo Schedule A listing the appropriate contributions and identification or file an amendment to the report originally disclosing the contribution with the contributor identification. *Id.*

IV. ANALYSIS

A. Contributions from Individuals

The complainant alleges that the Committee accepted excessive contributions from individuals totaling \$43,125. Attachment 2 at 3. The Audit Division found that the Committee accepted excessive contributions from individuals totaling \$53,000.¹⁰ Attachment 1 at 4.

¹⁰ The complainant alleges that the Committee accepted \$9,875 less in excessive contributions than the Audit Division because the complainant's figure is derived solely from the total amount of refunds disclosed on the Committee's 1999 Mid-Year Report.

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2. Other Individual Contributors

The Audit Division found that the following individuals contributed the following amounts to the Committee: David Berndt (\$2,000 for the primary), William C. Deviney, Jr. (\$4,000 for the primary), Jerry W. Kemp (\$2,000 for the general), William H. Liston (\$3,000 for the general), Charles V. McTeer (\$2,500 for the general), Earline C. Sawyer (\$4,000 for the primary), Ray A. Sims (\$3,750 for the primary),¹⁷ Phyllis Smith (\$3,000 for the general), and Lawrence W. Warren (\$7,500 for the primary). Attachment 1 at 9. Therefore, based on the audit referral and the schedule of contributions, this Office recommends that the Commission find reason to believe that David Berndt, William C. Deviney, Jr., Jerry W. Kemp, William H. Liston, Charles V. McTeer, Earline C. Sawyer, Ray A. Sims, Phyllis Smith, and Lawrence W. Warren each violated 2 U.S.C. § 441a(a)(1)(A).

¹⁷ According to the audit workpapers, \$1,000 of a contribution from Sims & Sims, a partnership, is attributable to Mr. Sims for the primary. In addition, Mr. Sims contributed \$2,750 for the primary election. Attachment 1 at 9.

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However, given

the relatively small total amounts of the aggregated contributions from David Berndt, William C. Deviney, Jr., Jerry W. Kemp, William H. Liston, Charles V. McTeer, Earline C. Sawyer, Ray A. Sims, and Phyllis Smith, and in furtherance of the Commission's priorities and resources, this Office recommends that the Commission take no further action, close the file and send an admonishment letter with respect to each of these respondents. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

B. Contributions from Political Committees

Consistent with the complaint's allegation that the Committee accepted excessive contributions from IBEW-COPE, MWPL, and other unidentified political committees, Attachment 2 at 3, the Audit Division found that the Committee accepted a total of \$5,500 in excess of the contribution limitation from three political committees: IBEW-COPE contributed \$2,000 in excess of the limitation to the 1998 general election; MWPL contributed \$2,500 in excess of the limitation to the 1998 general election; and Nancy Pelosi for Congress contributed \$1,000 in excess of the limitation to the 1998 general election. MWPL contributed \$2,500 to the 1998 primary on June 19, 1998, but the primary election was held on June 2, 1998. Based on the date of the check, the Audit Division believed this contribution was attributable to the general election and therefore excessive based on other amounts contributed for the general election. However, it appears that this amount was appropriately contributed to the primary election since it appears to have been designated for the primary election and the Committee had net debts.¹⁹

¹⁹ The check copy is difficult to read and therefore the designation to the primary election is unclear, but based on MWPL's response and a comparison with other checks from MPWL, it appears that the \$2,500 at issue was

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See 11 C. F. R. § 110.1(b)(3)(i). Therefore, this Office recommends that the Commission find no reason to believe that Maintenance of Way Political League and William E. LaRue, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) and close the file with respect to these respondents.

This Office also recommends that the Commission find reason to believe that IBEW-COPE and Edwin D. Hill, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).²¹ In addition, this Office recommends that the Commission find reason to believe that Nancy Pelosi for Congress, and Paul F. Pelosi, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). However, in furtherance of the Commission's priorities and resources, this Office recommends that the Commission take no further action and close the file with respect to these violations and send an admonishment letter to these respondents.

appropriately designated to the primary election. The Committee's 1998 Year End Report disclosed net debt in the amount of \$20,275.

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C. **Alleged Corporate Contributors**

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The complaint identifies four entities that allegedly made prohibited contributions to the Committee: Adcock/Apple Apartments (\$100), Employer Plus, Inc. (\$1,000), L&K Investments (\$1,000), and Southern Development (\$1,000). Attachment 2 at 2. Employer Plus, Inc. did not respond to the complaint. Responses to the complaint from L&K Investments and Southern Development assert that they are not incorporated. Attachments 9 and 10. Adcock/Apple Apartments' response to the complaint characterizes the entity as a "private ownership business," Attachment 8, but no such corporation is listed with the Mississippi Secretary of State, the Audit Division's source for the identification of corporations. In addition, the Audit Division did not identify L&K Investments and Southern Development as incorporated, as they, too, are not listed by the Mississippi Secretary of State's Office.²² Therefore, this Office recommends that the

²² Nonetheless, the Committee refunded these contributions. Attachment 3.

Commission find no reason to believe Adcock/Apple Apartments, L&K Investments, and Southern Development violated 2 U.S.C. § 441b(a) and close the file with respect to these respondents.

The Audit Division found that the following corporations registered with the Mississippi Secretary of State contributed to the Committee: Carpenter Construction Co. (\$500); D&M Construction (\$100); Dorsey & Thom's Chiropractic Clinic, P.A. (\$100);²³ Dulin & Dulin, Ltd. (\$100); Duncan Engineering (\$500); Duncan Lee Lott, P.A. (\$100); Employer Plus, Inc. (\$1,000); Funches & Associates (\$100); Gerald J. Diaz, Jr., P.A. (\$500); Great Southern Tractor (\$500); Greenville Chiro. Clinic (\$200); Ingram & Assoc. (\$1,500); Kirk & Co. (\$50); Langston/Frazer Properties (\$1,000); Natchez Steam Laundry (\$100); Southwest Publishers (\$100); and Tollison Law Firm, P.A. (\$500).²⁴ Therefore, this Office recommends that the Commission find reason to believe that each of these contributors violated 2 U.S.C. § 441b(a). However, given the relatively low amounts of the contributions and in furtherance of the Commission's priorities and resources, this Office recommends that the Commission take no further action, close the file and send an admonishment letter with respect to each of these respondents. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

²³ Although no corporation by this exact name is indexed with the Mississippi Secretary of State's Business Services Division, the Audit Division included this corporation because "P.A" appears in its name. Mississippi law provides that the name of a domestic professional corporation must contain the words "professional corporation" or "professional association" or their abbreviations. Miss. Code. § 79-10-21 (2000). In addition, a similarly-named administratively dissolved corporation is listed with the Secretary of State at the same address disclosed on the contribution check.

²⁴ The Mississippi Secretary of State's Business Services Division ("MSSBSD") discloses that as of November 15, 1999, Funches & Associates and Natchez Steam Laundry had a status of administrative dissolution. The MSSBSD discloses that as of May 1, 1989, Kirk & Co. had a status of administrative dissolution. Mississippi law provides that a corporation administratively dissolved continues its corporate existence. Miss. Code § 79-14.21(c) (2000).

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D. Currency Contributions

The Committee received \$23,881 in gross currency deposits. The Audit Division found that the Committee accepted \$9,205 in excessive currency contributions and excessive anonymous cash contributions. This amount includes a \$500 cash contribution from David Stephens. Attachment 1 at 6-7;²⁵ 2 U.S.C. § 441g. The Committee refunded the \$500 contribution to David Stephens on June 18, 1999 and transferred-out the remaining excessive currency amounts on October 1, 1999. Attachment 1 at 7.

This Office also recommends that the Commission find reason to believe that David Stephens violated 2 U.S.C. § 441g. In furtherance of the Commission's priorities and resources, however, this Office recommends that the Commission take no further action, close the file and send an admonishment letter with respect to David Stephens. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

²⁵ The Audit Division clarified that the amount of impermissible cash contributions that the Committee received is calculated as follows: \$23,881 (gross currency deposits) - \$14,091 (the amount documented as currency deposits involving anonymous contributions of \$50 or less or individual cash contributions of \$100 or less) - \$485 (the amount of additional anonymous cash contributions the Committee could have retained) - \$100 (the permissible portion of David Stephens' contribution).

²⁶ The contribution from David Stephens was refunded approximately 10 months after it was received on August 12, 1998. The other cash amounts were raised at events between February 1998 and October 1998, but not transferred-out until October 1, 1999.

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VI. RECOMMENDATIONS

1. Open a MUR in AR #99-21.

4. Find reason to believe that David Berndt, William C. Deviney, Jr. Jerry W. Kemp, William H. Liston, Charles V. McTeer, Earline C. Sawyer, Ray A. Sims, and Phyllis Smith each violated 2 U.S.C. § 441a(a)(1)(A) and take no further action, send an admonishment letter, and close the file with respect to them;

8. Find reason to believe that International Brotherhood of Electrical Workers' Committee on Political Education and Edwin D. Hill, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) and take no further action, send an admonishment letter, and close the file with respect to these respondents;

9. Find no reason to believe that Maintenance of Way Political League and William E. LaRue, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) and close the file with respect to these respondents;

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10. Find reason to believe that Nancy Pelosi for Congress and Paul F. Pelosi, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) and take no further action, send an admonishment, and close the file with respect to these respondents;


11. Find no reason to believe Adcock/Apple Apartments, L&K Investments, and Southern Development violated 2 U.S.C. § 441b(a) and close the file with respect to these respondents;

12. Find reason to believe that Carpenter Construction Co.; D&M Construction; Dorsey & Thom's Chiropractic Clinic, P.A.; Dulin & Dulin, Ltd.; Duncan Lee Lott, P.A.; Dungan Engineering, P.A.; Employer Plus, Inc.; Funches & Associates; Gerald J. Diaz, Jr., P.A.; Great Southern Tractor; Greenville Chiro. Clinic; Ingram & Assoc.; Kirk & Co.; Langston/Frazer Properties; Natchez Steam Laundry; Southwest Publishers; and Tollison Law Firm, P.A. each violated 2 U.S.C. § 441b(a) and take no further action, send an admonishment letter, and close the file with respect to these respondents;

13. Find reason to believe that David Stephens violated 2 U.S.C. § 441g and take no further action, send an admonishment letter, and close the file with respect to him;

Lois G. Lerner
Acting General Counsel

5/14/01
Date

BY: 
Gregory R. Baker
Acting Associate General Counsel

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